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Revised 12/04

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CORRESPONDENCE  
CONTROL

STATE OF COLORADO

Bill Owens, Governor  
Douglas H. Benevento, Executive Director

*Dedicated to protecting and improving the health and environment of the people of Colorado*



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December 17, 2004

Mr. Joseph Legare  
Director, Project Management Division  
U.S. Department of Energy  
Rocky Flats Field Office  
10808 Highway 93, Unit A  
Golden, Colorado 80403-8200

RE: Draft Data Summary Report for IHSS Group 700-8 IHSS 700-214, 750 Pad Pondercrete/Saltcrete Storage,  
December 2004

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the Division) hereby grants approval for the subject report and, as a consequence, No Further Accelerated Action (NFAA) for IHSS Group 700-8. Comment resolution meetings were successful in resolving the Division's comments, attached.

One issue was mapping inconsistency between biased sample locations and the biased features, i.e. patches, cracks, etc. That mapping issue has been resolved fully.

The Division also expressed concern that the erosion potential of the site was insufficiently addressed especially considering a plan to extend shallow drainage westward on to the 750 Pad. We now understand that the final land configuration will not result in the drainages being extended. Nevertheless, the drainage(s) in question is located a short distance east of the 750 Pad and head ward erosion onto the 750 Pad site is conceivable. Verbal agreement was reached today (Karen Wiemelt and Harlen Ainscough) to acknowledge and discuss, within the final report, the natural erosion potential of soils from the site.

We look forward to the inclusion of the erosion discussion and to confirming that additional, minor changes are reflected in the final document. If you have any questions regarding this correspondence, please contact me at (303) 692-3367, Harlen Ainscough at 303-692-3337 or David Kruchek at 303-693-3328.

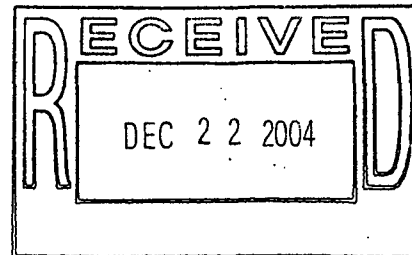
Sincerely,

Steven H. Gunderson  
RFCA Project Coordinator

Attachment

cc: Mark Aguilar, EPA  
Larry Kimmel, EPA  
Dave Shelton, KH  
Steve Nesta, KH

Mark Sattelberg, U.S.F&W  
Norma Castaneda, DOE  
Karen Wiemelt, KH  
Administrative Records Building T130G



ADMIN RECORD

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft Data Summary Report  
for

IHSS Group 700-8

IHSS 700-214, 750 Pad Pondcrete/Saltcrete Storage  
December 2004

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Specific Comments:

1. Section 2.1: A discussion of the operation of the 10K tanks used to store SEP sludge on the 750 pad, beginning in the mid '90s, should be added.
2. Figure 3: The symbols for the sampling locations are not fully consistent with the legend, yellow versus blue. Please correct. Additionally, the data appear to be limited to historical results not accelerated action characterization as shown in the title block.
3. Figure 5: It appears that features related to biased sampling locations do not match actual locations. See CI42-008 on the figure and in Table 2, Deviations.
4. Figure 6: See Comment No. 3.
5. Table 4: Does Table 4 include the Sediment data provided in Table 3? Yes or No, a separate table may be appropriate.
6. Section 4.0, Screens 2 and 3: With all COCs below WRW ALs, these two screens may be deleted.
7. Page 52: Please revise the last sentence of the first paragraph for clarity.

E-mailed comments, David Kruchek

1. Section 4 - Screen 2, should include a discussion of the obvious erosion potential of this area, being a steep slope at the end of the south walnut creek drainage. Also the proposed land reconfiguration for this area will also disturb this area and create additional erosion potential. As such, these concerns should be properly discussed in this screen.
2. Section 4 - Screen 4, should change this discussion to properly address the erosion potential and discuss the potential for surface water degradation from the contamination identified above background and MDLs. Just because this undisturbed area has not been identified as a source for contamination seen at GS10 or at other current surface and groundwater monitoring locations, does not mean that this area will not be a possible source in the future, especially considering the levels of contamination found (Pu above 4 pCi/g in the sediments), and possible releases from this area during and after removal of the asphalt and reconfiguration activities.
3. Section 5 - Although the discussion provided may be technically correct, it should be expanded to recognize the need to include possible additional remediation if contamination is identified during future D&D and/or ER activities, such as removal of the asphalt, and the need for appropriate surface water erosion/runoff controls during and after asphalt removal and land reconfiguration to prevent degradation of surface water quality. This would be similar to issues identified at other areas such as the B779 area.